Baker & Hostetler LLP

45 Rockefeller Plaza

New York, New York 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Marc E. Hirschfield Nicholas J. Cremona Oren J. Warshavsky Tatiana Markel

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SUSAN SCHEMEN FRADIN REVOCABLE AGREEMENT OF TRUST DATED 5/23/2000 and

SUSAN SCHEMEN FRADIN, individually, as beneficiary and as trustee of the Susan Schemen

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04525 (SMB)

Fradin Revocable Agreement of Trust Dated 5/23/2000,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed on or before June 12, 2015.
- 2. The Disclosure of Case-in-Chief Experts shall be due on September 11, 2015.
- 3. The Disclosure of Rebuttal Experts shall be due on October 16, 2015.
- 4. The Deadline for Completion of Expert Discovery shall be January 15, 2016.
- 5. The Deadline for Service of a Notice of Mediation Referral shall be February 19, 2016.
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be March 4, 2016.
- 7. The Deadline for Conclusion of Mediation shall be July 8, 2016.

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Dated: New York, New York April 1, 2015

By: <u>s/Marc E. Hirschfield</u>

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New York, New York 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Marc E. Hirschfield

Email: mhirschfield@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Oren J. Warshavsky

Email: owarshavsky@bakerlaw.com

Tatiana Markel

Email: tmarkel@bakerlaw.com

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